

May 7, 2008

Mr. George Dyer, Superintendent Concord Community Schools #2270 59040 Minuteman Way Elkhart, Indiana 46517-3499

Dear Mr. Dyer:

On March 27, 2008 the Indiana Department of Education's monitoring team commenced an on-site monitoring review of the Concord Community Schools' administration of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB). Enclosed is a report based upon this review.

Prior to, during, and following the on-site monitoring review, the IDOE team conducted a number of activities (described in the attached report) to verify compliance with 1) the programmatic requirements of Title I, Part A; and 2) the fiscal requirements that must be followed by recipients of Title I, Part A educational funds.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, Concord Community Schools is responsible for taking appropriate action to remedy compliance deficiencies. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer term measures are necessary, Concord Community Schools must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will be happy to provide technical assistance to Concord Community Schools where appropriate.

The IDOE team would like to thank you, Wayne Stubbs, Connie Crumb, and other staff for their work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting Concord Community Schools to improve the delivery of Title I services.

Sincerely,

Lee Ann Kwiatkowski, Director Office of Title I Academic Support

cc: Wayne Stubbs, Title I Program Administrator Concord Community Schools #2270

Linda Miller, Assistant Superintendent Center for School & Student Academic Support, IDOE

## Indiana Department of Education Title I, Part A Monitoring

**LEA**: Concord Community Schools **Monitoring Date**: March 27, 2008

Monitoring Team: Sarah Pies, Teresa Neely, Laura Cope, Brenda Martz, Linda

Ricketts, and Lenee Reedus

#### **Background Information**

The Indiana Department of Education (IDOE) commenced on-site monitoring of the Concord Community Schools on March 27, 2008. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with Title I, Part A and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

Monitoring Topic		Statutory Citation
1)	Compliance with professional	NCLB §1111(h)(6(A)
	qualification requirements for	NCLB §1119(c)(1)
	teachers and paraprofessionals	NCLB §9101(23)
2)	Compliance with parental	NCLB §1118(a)-(h)
	involvement requirements	NCLB §1111(c)(14)
		NCLB §1111(d)
		NCLB §1116(a)(1)(D)
		NCLB §9101(32)
3)	Compliance with school	NCLB §1116(b)
	improvement requirements	NCLB §1116(c)
		NCLB §1116(e)
4)	Compliance with LEA	NCLB §1116(c)
	improvement requirements	
5)	Compliance with schoolwide	NCLB §1114
	program requirements	
6)	Compliance with targeted	NCLB §1115
	assistance program	
	requirements	
7)	Compliance with school ranking	NCLB §1113
	and serving requirements	
8)	Compliance with comparability	NCLB §1120A
	requirement	

Compliance with maintenance of effort requirement	NCLB §1120A NCLB §9521
10)Compliance with equitable	NCLB §1120
services to private school	
students requirements	
11)Compliance with statutory set-	NCLB §1113
aside requirements	NCLB §1116
	NCLB §1118
12)Compliance with supplement,	NCLB §1120A
not supplant requirements	
13)Compliance with financial	EDGAR §80.20
management systems	EDGAR §80.36
requirements	
14)Compliance with compensation	OMB Circular A-87, Attachment B,
for personnel services	Section 8
requirements	
15) Compliance with complaint	Subpart F—Complaint Procedure
procedures	(CFR, Title 34)
16)Compliance with equipment	EDGAR §80.32
requirements	OMB Circular A-87

During the on-site visit, IDOE spent time interviewing staff from Concord Community Schools at their central office. In addition, IDOE visited two schools, where interviews were conducted with the principal and the Title I staff.

IDOE also reviewed Concord Community Schools' documents, including LEA policies and procedures, LEA notices to parents, LEA plans, school plans, personnel information, budget documents, contracts, and expenditure reports.

Based on the above information, our report follows.

## Monitoring Topic 1: Compliance with NCLB professional qualification requirements for teachers and paraprofessionals

#### **Background**

IDOE interviewed the Title I Program Administrator and building principals. In addition, IDOE reviewed letters to personnel, and notices to parents.

Statutory Requirement: Professional qualifications requirements are contained in Sections 1111 and 1119 of Title I. In addition, "highly qualified" is defined in Section 9101(23) of the general provisions section of NCLB.

#### **Areas of Compliance**

**Principal Attestation:** Concord Community Schools ensures that the principal of the school receiving Title I funds has attested annually, in writing, as to whether the school is in compliance with the professional qualification requirements of NCLB. As part of the annual application review, grant approval is not given unless each principal has signed a template attesting that their school is in compliance with the professional qualification requirements of NCLB.

**Title I Instructional Paraprofessional Requirements**: Concord Community Schools does not hire paraprofessionals with Title I funds.

Parents' Right-to-Know re: non-highly qualified teacher: Concord Community Schools has not had a teacher that has taught for 4 or more consecutive weeks in a core academic subject area who was not highly qualified.

## <u>Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1</u>

**Highly Qualified Teachers:** Concord Community Schools could not provide evidence that all core academic subject teachers are highly qualified. After a random sampling of core academic teachers at West Side and South Side Elementary, High Objective Uniform State Standard of Evaluation (HOUSSE) rubrics had not been completed for veteran teachers.

**Required Action:** Concord Community Schools must ensure that all core academic subject teachers are highly qualified. Procedures must be in place for determining if new and existing teachers are highly qualified. HOUSSE documentation must be available upon request.

**5 Percent Set-Aside:** Concord Community Schools did not reserve 5 percent of its allocation to support assisting teachers in reaching the professional qualification requirements. Concord Community Schools could not provide evidence that all teachers in core academic subjects in Title I schools are highly qualified.

**Required Action:** Concord Community Schools must ensure that all core academic subject teachers are highly qualified. Concord Community Schools must set-side 5 percent of their allocation in the 2008-2009 application to help teachers become highly qualified.

Parents' Right-to-Know re: request for teacher qualifications: Concord Community Schools was able to demonstrate that letters had been mailed to all parents of students attending the Title I schools, but the letters were not mailed until February.

**Required Action:** Concord Community Schools must ensure that the Parents Right-to-Know letters will be mailed at the beginning of the year to all students in all Title I buildings.

#### Monitoring Topic 2: Compliance with parental involvement requirements

#### Background

IDOE interviewed the Title I Program Administrator and building principals.

Statutory Requirement: Parental involvement requirements are contained throughout Title I, specifically in Sections 1111, 1116, and 1118. In addition, parental involvement is defined in Section 9101(23) of the general provisions section of NCLB. (See Attachment A)

#### **Areas of Compliance**

**Annual meeting:** Both West Side and South Side Elementary held an annual parent meeting. Concord Community Schools provided evidence of sign-in sheets and PowerPoint presentation from the meeting.

Building schools' and parents' capacity for strong parental involvement: Concord Community Schools provided evidence of building parents capacity to be involved in school. Both West Side and South Side Elementary had translators available for parents at family nights as well as translating information sent home to parents in a language and format that parents can understand. The schools communicate with the LEA's Headstart program to increase the participation of parents.

**Parent Information Resource Center:** Concord Community Schools provided evidence that parents were notified of the existence of the Parent Information Resource Center. Documentation of flyers were provided.

## <u>Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2</u>

**LEA Parental Involvement Policy:** Concord Community Schools provided evidence of an LEA Parental Involvement Policy, but it did not contain all required components and was not developed and revised with meaningful consultation with parents. (See Attachment A)

**Required Action:** Concord Community Schools must send the IDOE, by September 1 their revised 2008-2009 LEA Parent Involvement Policy containing the required components. Concord Community Schools must also submit an agenda and sign-in sheet of parents that were involved in the revision of the LEA Parental Involvement Policy.

**School Parental Involvement Policy:** Although South Side and West Side Elementary Schools had a School Parental Involvement Policy required components were missing. Parents were not actively involved in the joint development of the plan. (See Attachment B and C)

**Required Action:** Concord Community Schools must ensure that all Title I schools have School Parental Involvement Policies that contain the required components and are developed and revised annually with meaningful consultation with parents as stated in Sec. 1118 in order to be in compliance with NCLB requirements.

In addition, Concord Community Schools must submit to the IDOE a School Parent Involvement Policy from South Side and West Side Elementary to verify compliance with NCLB requirements by September 1 for the 2008-2009 school year. Concord Community Schools must also submit an agenda and sign-in sheet of parents that were involved in the revisions of the School Parental Involvement Policies at West Side and South Side Elementary.

**School-Parent Compact:** Concord Community Schools provided evidence that schools have developed School-Parent Compacts, but they were not compliant with the requirements of Sec. 1118. South Side and West Side Elementary had compacts, but they did not contain all the required components. (See Attachment D and E)

**Required Action:** Concord Community Schools must ensure that all Title I schools have a School-Parent Compact which contains all the required components as stated in Sec. 1118 in order to be in compliance with NCLB.

In addition, Concord Community Schools must submit to the IDOE a School-Parent Compacts from South Side and West Side Elementary by September 1<sup>st</sup> for the 2008-2009 school year. Concord Community Schools must also submit an agenda and sign-in sheet of parents that were involved in the revisions of the School-Parental Compacts at West Side and South Side Elementary.

Reviews Effectiveness of Parental Involvement Activities: Concord Community Schools could not provide evidence that the LEA reviews the effectiveness of school parent involvement activities. West Side Elementary's ESL teacher provided evidence of surveys given to parents discussing the effectiveness of parent activities.

**Required Action:** Concord Community Schools must ensure that the LEA and all Title I schools review the effectiveness of school parental involvement activities. Concord Community Schools must ensure parents are given surveys after parent workshops and input is given on what else the parents need. Evidence such as surveys, meetings to discuss parent involvement activities, and interviews with parents must be provided to ensure the parent involvement activities for the 2007-2008 school year were reviewed for the effectiveness by September 1.

#### Monitoring Topic 3: Compliance with school improvement requirements

#### **Background**

IDOE interviewed the Title I Program Administrator and building principals to discuss school improvement issues.

Statutory Requirement: School improvement, corrective action, restructuring, and alternative governance requirements, including proper implementation of public school choice and supplemental educational services are contained in Section 1116. Depending on the number of years a school has not made adequate yearly progress (AYP), the school, LEA, and in certain cases state, must take certain actions.

#### **Areas of Compliance**

**Public School Choice:** Concord Community Schools demonstrated that it is in compliance with the Public School Choice requirement. Concord Community Schools provided evidence that parents were notified of their school choice option and is keeping required documentation of student transfers. Concord Community Schools provided a spreadsheet of the history of all choice transfers in the LEA.

## <u>Findings of Non-Compliance, Required Actions, and Recommendations, s for Monitoring Topic 3</u>

**School Improvement Plans:** Concord Community Schools was not able to demonstrate that South Side and West Side Elementary developed a school improvement plan that contained the ten required components under NCLB. Evidence could not be provided that the plan was developed and revised in consultation with parents, school staff, the LEA and outside experts. (See Attachment F and G)

**Required Action:** Concord Community Schools must ensure that all schools identified for school improvement have developed a school improvement plan

consistent with NCLB components and timelines by June 25. In addition, the revised school improvement plan for South Side and West Side for the 2008-2009 must be sent to the IDOE by July 1.

**Peer Review of Improvement Plans:** Concord Community Schools demonstrated that it has a process for presenting school improvement plans to the LEA administrators, but could not ensure that the school improvement plans are peer reviewed.

**Required Action:** Concord Community Schools must ensure, within 45 days of receiving a school plan the LEA establish a peer review process to assist with review of each school plan and promptly review the school plan, work with the school as necessary and approve the school plan if the plan meets the ten required components under NCLB.

Supplemental Educational Services (SES) Expenditure Tracking: Concord Community Schools could not provide evidence that the LEA tracks SES enrollment numbers and tracks the amount of funds being expended for each SES student, to ensure that the LEA is not paying for tutoring costs beyond the LEA's PPE amount.

Required Action: Concord Community Schools must ensure that SES enrollment and funds are tracked for the 2008-2009 school. Concord Community Schools must ensure that a system is in place to verify student attendance. In addition, the LEA must ensure that tracking of how much the PPE each student has left after each invoicing period, tracking of how much the total Contract amount the LEA has paid each provider, and overall how much of the LEA's SES funds have been expended on a regular basis. The IDOE recommends using the Sample Tracking Spreadsheet. (See Attachment H)

**Supplemental Educational Services Agreement:** Concord Community Schools could not provide evidence that the SES agreement between the LEA, providers, and parents contained specific achievement goals for each student. The agreements contained LEA developed goals, but were not specific for each student.

**Required Action:** Concord Community Schools must ensure agreements between the parents, providers and LEAs include:

- a statement of specific achievement goals for the student,
- how the student's progress will be measured,
- how parents and teachers will be regularly informed of student progress,
- a timetable for improving achievement, and
- provisions with respect to the making of payments to the provider.

#### Monitoring Topic 4: Compliance with LEA improvement requirements

#### Background

IDOE interviewed the Program Administrator and building principals to discuss LEA improvement requirements.

Statutory Requirement: LEA (local educational agency) improvement requirements are contained in §1116(c).

#### **Areas of Compliance**

**Comprehensive LEA Improvement Plan:** Concord Community Schools has a LEA improvement plan that meets the statutory components required by Title I and NCLB. Interviews with principals and teachers provided evidence that the LEA improvement plan has been implemented in the district.

## <u>Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 4</u>

**LEA Improvement letter:** Concord Community Schools could not provide evidence that all parents in the LEA received the LEA Improvement letter.

**Required Action:** Concord Community Schools must ensure the LEA Improvement letter is mailed before the beginning of the school year to all parents in the LEA. Concord Community Schools must submit a mailing receipt to the IDOE upon receipt of this report showing all parents in the LEA received the 2008-2009 LEA Improvement letter provided by the State in English and Spanish.

#### **Monitoring Topic 5: Compliance with schoolwide program requirements**

#### Background

Concord Community Schools does not have schoolwide programs in their Title I buildings.

Statutory Requirement: The schoolwide program requirements are contained in Section 1114. In general, in an eligible schoolwide program school federal, state, and local funds can be combined to upgrade the entire educational program (except Reading First funds). Unlike a targeted assistance school, where certain students must be identified for Title I services, in a schoolwide program school all students are considered to be eligible for services and the goal is to upgrade the entire educational program of the school. In addition, in a schoolwide school, schools are not required to maintain separate fiscal records, by program, that identify activities supported with particular

funds as long as the school maintains records that demonstrate that the schoolwide program, as a whole, addresses the intent and purposes of each Federal program that was consolidated.

#### Monitoring Topic 6: Compliance with targeted assistance program requirements

#### Background

IDOE interviewed the Title I Program Administrator and building principals regarding targeted assistance school program requirements.

Statutory Requirement: The targeted assistance program requirements are contained in Section 1115. In a targeted assistance school, a school must maintain a list of eligible children who receive Title I services. Eligible children are children identified by the school as failing, or most at risk of failing, to meet the State's challenging student academic achievement standards.

#### **Areas of Compliance**

**Proper Use of Funds:** Concord Community Schools provided evidence that Title I funds are being expended for identified students only.

**Integration of Staff:** Concord Community Schools provided evidence that staffs supported with targeted assistance funds are integrated into the regular school program, including professional development.

**Student Eligibility and Selection:** Concord Community Schools provided evidence that students were selected for Title I services based on multiple educationally related, objective, uniformly applied criteria give to all students at each grade level targeted.

## <u>Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 6</u>

None

#### Monitoring Topic 7: Compliance with school ranking and serving requirements

#### **Background**

IDOE interviewed the Title I Program Administrator regarding the Title I ranking and serving requirements. In addition, IDOE reviewed documentation related to this requirement.

Statutory Requirement: The ranking and serving requirements are contained in Section 1113.

#### **Areas of Compliance**

**Ranking and serving:** Concord Community Schools demonstrated compliance with the ranking and serving requirements.

## <u>Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 7</u>

None

#### **Monitoring Topic 8: Compliance with comparability requirement**

#### Background

IDOE interviewed the Title I Program Administrator regarding the Title I comparability requirement.

Statutory Requirement: The comparability requirement is contained in Section 1120A.

## <u>Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 8</u>

Comparability: Concord Community Schools could not provide evidence that a comparability report had been performed since 2005. The IDOE gave technical assistance to Concord Community Schools on their comparability report. Concord Community Schools with the assistance of the IDOE completed comparability reports for the 2006-2007 and 2007-2008 school year. The IDOE recommends Concord Community Schools read the comparability guidance provided on the Office of Title I Academic Support website at: <a href="http://www.doe.state.in.us/Titlel/comparability\_info.html">http://www.doe.state.in.us/Titlel/comparability\_info.html</a>.

**Required Action:** Concord Community Schools must ensure comparability reports are completed yearly and submitted biannually to the IDOE. Concord Community Schools must submit their comparability report for the 2008-2009 school year by October 15. Failure to achieve comparability results in Title I funds already expended in the non-comparable building(s) being subject to repayment, and all unspent Title I funds being withheld for the reminder of the fiscal year.

#### Monitoring Topic 9: Compliance with maintenance of effort requirement

#### **Background**

The Indiana Department of Education conducts yearly review of maintenance of effort for all Title I schools.

Statutory Requirement: The maintenance of effort requirements are contained in Section 1120A of Title I and Section 9521 of the general provisions section of NCLB.

#### **Areas of Compliance**

Concord Community Schools is in compliance with the maintenance of effort requirement.

## <u>Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 9</u>

None

## Monitoring Topic 10: Compliance with equitable services to private school students' requirements

#### **Background**

IDOE interviewed the Title I Program Administrator regarding equitable services to private school students.

Statutory Requirements: The equitable services requirements are contained in Section 1120.

#### **Areas of Compliance**

**Consultation:** Concord Community Schools provided evidence that consultation occurred between the LEA and nonpublic school officials regarding participation in Title I. Both Redeemer Community Christ and Elkhart Christian Academy were contacted by the LEA and declined Title I services at this time.

## <u>Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 10</u>

None

#### Monitoring Topic 11: Compliance with statutory set-aside requirements

#### **Background**

IDOE interviewed the Title I Program Administrator regarding the Title I statutory setaside requirements.

Statutory Requirements: The statutory set-aside requirements are contained throughout Title I, including required reservations for neglected and delinquent children; homeless children, public school choice, supplemental educational services, school improvement, parental involvement and professional development (see Sections 1113, 1116, and 1118).

#### **Areas of Compliance**

**Choice Transportation and SES:** Concord Community Schools used general funds for Choice related transportation. Concord Community Schools appropriately expended funds for SES.

## <u>Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 11</u>

**Homeless:** Concord Community Schools did not set aside funds for homeless students in non-Title I schools. Concord Community Schools included a letter from the superintendent stating that additional funds will supplement homeless students' education in non-Title I schools.

**Required Action:** Concord Community Schools must set aside funds in the 2008-2009 application for homeless students in non-Title I buildings using their Title I funds. In addition, the homeless liaison for Concord Community Schools must be registered with Christina Endres, Education of Homeless Children and Youth Specialist, at the IDOE.

1 percent Parental Involvement with 95 percent being used at the schools: Concord Community Schools set-aside 1 percent for Parental involvement, but the funds were not expended. Concord Community Schools were required to set aside \$5,212.60 off the top for parental involvement activities and only expended \$1,066.70.

**Required Action:** Concord Community Schools must add \$4,145.90 to the mandatory 1 percent set aside in the 2008-2009 parent involvement budget. Concord Community Schools must ensure that 95 percent of the 1 percent is being used at the schools.

**10 percent School Improvement:** Concord Community Schools set-aside 10 percent of funds for each school in improvement, but did not expend the funds in 2006-2007.

The required set-aside was \$23,958.39. The actual professional development expenditures were \$10,105.67.

**Required Action:** Concord Community Schools must add \$13,852.72 to the mandatory 10 percent set-aside for West Side Elementary in the 2008-2009 application.

#### Monitoring Topic 12: Compliance with supplement, not supplant requirements

#### **Background**

IDOE interviewed the Title I Program Administrator regarding the Title I supplement, not supplant requirements.

Statutory Requirement: Section 1120A requires Title I funds to supplement, not supplant non-Federal sources of funds.

#### **Areas of Compliance**

**Supplement, not Supplant:** Concord Community Schools provided evidence that the targeted assistance program expenditures were used to meet the statutory requirements for such programs and did not supplant non-federal resources.

## <u>Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 12</u>

None

## Monitoring Topic 13: Compliance with financial management systems requirements

#### Background

IDOE interviewed the Title I Program Administrator and building principals regarding Concord Community Schools' financial management system.

Regulatory Requirement: Section 80.20 (b)-(i) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements financial management systems for non-State grantees (such as school LEAs). (See Attachment F)

#### **Areas of Compliance**

**Purchase Orders and Expenditures:** Concord Community Schools could provide evidence that a process is in place of an expense going from the budget page to

ordering and procurement, to the accurate documentation of expenditures maintained at the LEA for Title I.

**Contracted Services:** Concord Community Schools provided evidence that measures are in place to ensure contracted services (consultants) are working the amount of time for which they are paid.

## <u>Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 13</u>

**Internal Control**: Concord Community Schools could not explain the process for internal controls. Indirect cost was taken in the 2006-2007 but was not approved in the application. Concord Community Schools had lack of internal control per improper coding to wrong accounts. Instructional supplies were posted to professional development.

**Required Action:** Concord Community Schools must ensure that indirect cost is budgeted in the application before using indirect cost. If activities arise that are not in the original application, the LEA must submit an amendment prior to making the expenditure.

## Monitoring Topic 14: Compliance with compensation for personnel services requirements

#### Background

IDOE interviewed the Title I Program Administrator in regard to the compensation for personnel services requirements.

Circular Requirement: OMB Circular A-87, Attachment B, Section 8 details the requirements for all compensation for personnel services supported with federal funds. This section includes the time distribution and semi-annual certification requirements.

#### **Areas of Compliance**

**Compensation for personnel services requirements:** Concord Community Schools was able to provide evidence that personnel in "split-funded" positions (Title I and another source of funding) maintain Program Activity Reports (PAR)/Time and Effort logs. In addition "Semi-Annual Certification" was completed as required.

## <u>Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 14</u>

None

#### Monitoring Topic 15: Compliance with complaint procedure

#### **Background**

IDOE interviewed the Title I Program Administrator regarding Concord Community Schools' complaint procedure.

Regulatory Requirement: The SEA must adopt complaint procedures. The LEA must incorporate the elements required by NCLB for formal complaint procedures into local complaint procedure policies. The LEA must issue appropriate guidance to the schools. Complaint procedures are contained in Subpart F—Complaint Procedure (CFR, Title 34).

#### **Areas of Compliance**

**Complaint Procedure:** Concord Community Schools was able to provide evidence that the LEA has a complaint procedure policy. No complaints for Title I have been filed.

## <u>Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 15</u>

None

#### Monitoring Topic 16: Compliance with equipment requirements

#### **Background**

IDOE interviewed the Title I Program Administrator and a building principals regarding equipment acquired with Title I, Part A funds.

Regulatory Requirement: Section 80.32(b)-(h) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements for the use, management and disposition of equipment acquired with federal funds by non-State grantees (such as school LEAs).

#### **Areas of Compliance**

**LEA inventory list:** Concord Community Schools has not used Title I funds to purchase equipment or technology.

**Labeling of equipment and technology:** Concord Community Schools provided evidence that supplies are appropriately labeled and stamped "Title I" at the schools visited.

**Disposition of Equipment policy:** Concord Community Schools provided evidence of a Disposition of Equipment policy.

## <u>Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 16</u>

None

# Attachment A Concord Community Schools LEA Parental Involvement Policy

**Local Educational Agency (LEA) Parental Involvement Policy:** Sec. 1118 (a) (2) Each LEA shall develop jointly with, agree on with, and distribute to, parents of participating children a written parent involvement policy. The policy shall describe how the agency will:

Par	rental Involvement Policy Requirements:	Compliant		
1.	Involve parents in the joint development of the plan and the process of school review and improvement			
2.	Provide the coordination, technical assistance, and other support necessary to assist participating schools in planning and implementing effective parent involvement activities to improve student academic achievement and school performance	Yes		
3.	<ul> <li>□ Build the schools' and parents' capacity for strong parental involvement by</li> <li>□ Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children</li> <li>□ Providing materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology, as appropriate to foster parental involvement</li> <li>□ Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school</li> <li>□ Ensure that information related to school and parent programs, meetings, and other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children, to the extent practicable, is in a language that parents can understand</li> </ul>	Missing underlined		
	<ul> <li>Other reasonable support for parental involvement activities under section 1118 as parents may request</li> </ul>			
4.	Coordinate and integrate parental involvement strategies under Title I with strategies under other programs such as Head Start, Reading First, Early Reading First, Even Start, Parents as Teachers, and Home Instruction Program for Preschool Youngsters, and State-run preschool programs	Yes		
5.	Conduct, with the involvement of parents, an annual evaluation of the content and effectiveness of the parental involvement policy in improving the academic quality of the schools served under this part, including identifying barriers to greater participation by parents in activities (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background) and use the findings of such evaluation to design strategies for more effective parental involvement, and to revise, if necessary, the parental involvement policies	Yes		
6.	Involve parents in the activities of the schools served under Title I	Yes		

#### Attachment B

## South Side Elementary School Parent Involvement Policy

**School Parental Involvement Policy**: Section 1118 (b) Each Title I school shall jointly develop with, and distribute to, parents of participating children a written parental involvement policy, agreed on by such parents, that shall describe the means for carrying out the following requirements listed below.

Requirements of School Parental Involvement Policy				
1.	Convened an annual meeting at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A, and to explain the requirement of such and the right of the parents to be involved			
2.	Offered a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement	Yes		
3.	Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy	Yes		
4.	Provide parents with:     Provide timely information about Title I programs     A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet     If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible	Yes		
5. (SWP schools) If the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA				
6.	Includes a School-Parent Compact (see checklist next page)	Yes		
7.	<ul> <li>Build the schools' and parents' capacity for strong parental involvement by:</li> <li>Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children</li> <li>Providing materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, to foster parental involvement</li> </ul>	No-missing underlined		
	Coordinating and using technology, to loster parental involvement  Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children			
	Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school			
	<ul> <li>Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand</li> <li>Other reasonable support for parental involvement activities as parents may request</li> </ul>			

#### Attachment C

#### West Side Elementary School Parent Involvement Policy

**School Parental Involvement Policy**: Section 1118 (b) Each Title I school shall jointly develop with, and distribute to, parents of participating children a written parental involvement policy, agreed on by such parents, that shall describe the means for carrying out the following requirements listed below.

Red	quirements of School Parental Involvement Policy	Compliant
1.	Convened an annual meeting at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A, and to explain the requirement of such and the right of the parents to be involved	No
2.	Offered a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement	No
3.	Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy	No
4.	Provide parents with:     Provide timely information about Title I programs     A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet     If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible	No
5.	(SWP schools) If the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA	No
6.	Includes a School-Parent Compact (see checklist next page)	Yes
7.	<ul> <li>Build the schools' and parents' capacity for strong parental involvement by:</li> <li>Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children</li> <li>Providing materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, to foster parental involvement</li> </ul>	No
	<ul> <li>Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children</li> <li>Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and</li> </ul>	
	<ul> <li>build ties between parents and the school</li> <li>Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand</li> <li>Other reasonable support for parental involvement activities as parents may request</li> </ul>	

#### Attachment D

#### South Side Elementary School – Parent Compact

**School-Parent Compacts**: As a component of the school-level parental involvement policy, each Title I school shall jointly develop with parents for all children served, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parent will build and develop a partnership to help children achieve the State's high standards. Such compact shall:

Sch	School-Parent Compact shall include:				
1.	1. Describe the school's responsibility to provide high quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the state's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time				
2.	2. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum:				
	Parent-teacher conferences in elementary school, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement				
	☐ Frequent reports to parents on their children's progress				
	٥	Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities			

Attachment E

#### West Side Elementary School – Parent Compact

School-Parent Compacts: As a component of the school-level parental involvement policy, each Title I school shall jointly develop with parents for all children served, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parent will build and develop a partnership to help children achieve the State's high standards. Such compact shall:

#### **USED IDOE SAMPLE-NOT DEVELOPED WITH PARENTS**

School-Parent Compact shall include:				
1.	Describe the school's responsibility to provide high quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the state's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time	Yes		
2.	Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum:	Yes		
	Parent-teacher conferences in elementary school, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement			
	Frequent reports to parents on their children's progress			
	Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities			

#### Attachment F

#### South Side Elementary School Improvement Plan

**School Improvement Plan**: According to Sec. 1116 (b) (3) (A) after identification as a school in improvement, each school identified as in improvement shall, not later than 3 months after being so identified, develop or revise a school plan in consultation with parents, school staff, the LEA, and outside experts, for approval by such LEA. The school plan shall cover a 2-year period and include:

	Ten Components of School Improvement Plan*	Compliant
1.	Strategies based on scientifically based research strategies to strengthen core academic subjects that addresses the specific academic issues that caused the school to be identified for school improvement	Yes
2.	Policies and practices concerning core academic subjects that have the greatest likelihood that all groups of students will meet the proficient level on the ISTEP+	Yes
3.	Assurance that the school will spend not less than 10% each year to provide high quality professional development that:  Directly address the academic achievement problem that caused the school to be identified Meets NCLB's professional development requirements  Provides increased opportunity for participating in professional development	No-need to include page 14 and 15 from Title I Application
4.	Specifies how professional development funds will be used to remove the school from improvement status	Yes
5.	Annual measurable objectives for continuous and substantial progress by each group of students to meet proficient levels of achievement on the ISTEP+ (by 2013-2014)	No- Break down sub groups and create specific goals for each sub group
6.	Documentation that written notice about the identification of a school in improvement was provided to the parents of each student enrolled in the school in a language parents can understand.	Yes
7.	Specifies the responsibilities of the school, the LEA, and the SEA including technical assistance to be provided	Yes
8.	Strategies to promote effective parental involvement in the school	Yes
9.	Activities before and after school, during summer, and during any extension of the school year	Yes
10.	Incorporates a teacher-mentoring program (in addition to any the LEA might offer for new teachers)	Yes
	***************************************	

<sup>\*</sup>Consolidated plans are encouraged and accepted.

#### Attachment G

#### West Side Elementary School Improvement Plan

**School Improvement Plan**: According to Sec. 1116 (b) (3) (A) after identification as a school in improvement, each school identified as in improvement shall, not later than 3 months after being so identified, develop or revise a school plan in consultation with parents, school staff, the LEA, and outside experts, for approval by such LEA. The school plan shall cover a 2-year period and include:

\*Consolidated plans are encouraged and accepted.

	Ten Components of School Improvement Plan*	Compliant
11.	Strategies based on scientifically based research strategies to strengthen core academic subjects that addresses the specific academic issues that caused the school to be identified for school improvement	Needs to be strengthened
12.	Policies and practices concerning core academic subjects that have the greatest likelihood that all groups of students will meet the proficient level on the ISTEP+	Yes
13.	Assurance that the school will spend not less than 10% each year to provide high quality professional development that:  Directly address the academic achievement problem that caused the school to be identified Meets NCLB's professional development requirements  Provides increased opportunity for participating in professional development	Yes
14.	Specifies how professional development funds will be used to remove the school from improvement status	Yes
15.	Annual measurable objectives for continuous and substantial progress by each group of students to meet proficient levels of achievement on the ISTEP+ (by 2013-2014)	Yes
16.	Documentation that written notice about the identification of a school in improvement was provided to the parents of each student enrolled in the school in a language parents can understand.	Yes
17.	Specifies the responsibilities of the school, the LEA, and the SEA including technical assistance to be provided	Yes
18.	Strategies to promote effective parental involvement in the school	Yes
19.	Activities before and after school, during summer, and during any extension of the school year	Yes
20.	Incorporates a teacher-mentoring program (in addition to any the LEA might offer for new teachers)	Yes

## Attachment H Sample SES Tracking Sheet

#### SAMPLE TRACKING SPREADSHEET

PROVIDER ABC	30 sessions @\$40.=\$1200.	November	December	January	February	March	April	Student's Total (out of \$1200)
J. Miller		\$200	\$320	\$280	\$320	\$80	\$0	\$1,200
L. Smith		\$0	\$320	\$320	\$280	\$280	\$0	\$1,200
T. Jones		\$160	\$200	\$160	\$80	\$0	\$0	\$600
C. Brown		\$200	\$200	\$160	\$160	\$160	\$160	\$1,040
Total per month		\$560	\$1,040	\$920	\$840	\$520	\$160	\$4,040
Total remaining in Provious amount of \$24,000):	der's Contract (based on contracted	\$23,440	\$22,400	\$21,480	\$20,640	\$20,120	\$19,9 60	\$19,960

#### **Track Monthly:**

How much of each student's PPE has been expended (to ensure the LEA does not exceed a student's PPE).

How much the LEA has expended for each provider (to ensure the LEA does not exceed the contracted amount for that provider).

Number of students LEA approves a provider to tutor (to ensure the provider's total number of students doesn't exceed the contracted amount).